



August 22, 2024

Via ECF

Hon. Robyn F. Tarnofsky
United States Courthouse
500 Pearl Street
New York, NY 10007
TarnofskyNYSDChambers@nysd.uscourts.gov

Re: **Beter v. Baughman**
No. 24-cv-00079-GHW-RFT

Dear Judge Tarnofsky:

A telephonic conference is scheduled for August 29, 2024 at 10:00 AM to discuss Plaintiff's request for a protective order (ECF 75). Counsel for the parties are directed to join the conference at the scheduled time by dialing (646) 453-4442, Access Code: 252 848 884#.

Date: 8/23/2024

New York, NY

SO ORDERED

ROBYN F. TARNOFSKY

UNITED STATES MAGISTRATE JUDGE

As you know, I represent Petra Christina Beter in this matter. I write to respectfully request a pre-motion conference to seek a protective order to protect Ms. Beter from harassment by Mr. Baughman and his associates and representatives, and to forbid disclosure in discovery of her contact information, current address, personal vehicle information and drivers license.

Federal Rule of Civil Procedure 26(c) provides that the court may, for good cause, issue an order to protect a party or person from harassment, including forbidding the disclosure of discovery and forbidding the inquiry into certain matters. Fed. R. Civ. P. 26(c).

As you know, this case stems from Mr. Baughman's sexual assault of Ms. Beter in 2001. In discovery, Defendant produced an email chain from August 10, 2024 between Mr. Baughman and six (6) private investigators with the subject line "**Deposition Ploy.**" See Exhibit A. In the email, Michael Vaden, a private investigator hired by Mr. Baughman, states "Hey Sir, as discussed, we would proposal utilizing the deposition with Petra Beter Pacioni to uncover, under oath, her and Peter's current address, landlord, personal vehicle with tag, and current drivers license. If your attorney could ask for these at the beginning of the deposition and communicate her answers to us, we can verify the data in real time. . . . We need to know where she will be physically at the time of the deposition.....an attorney's office in the Cape Cod region or somewhere else?" Id.

During a good faith meet and confer today with Mr. Baughman's counsel, Mr. Baughman's counsel was unable to explain why Mr. Baughman has hired 6 investigators to locate Ms. Beter or why Mr. Baughman's investigators need to know where she is physically located during her deposition. Defendant's counsel even admitted during our meet and confer that the email is strange, and stated "We don't know why our client's do what they do." But given Mr. Baughman's history of sexually assaulting Ms. Beter, Ms. Beter is legitimately afraid for the safety of her husband and child, as well as her own safety.

Discovery in this matter has also revealed that one of Mr. Baughman's close associates, Kathryn Parrick, threatened Ms. Beter in the past (we have a recording of the telephone call). We have reason to believe from the discovery so far that Mr. Baughman has also engaged in cyberstalking of Ms. Beter in the past.

Any woman would be afraid of these five or six investigators looking for Ms. Beter, her car and license plate; not to mention calling her husband by her first name as if they know him (see Exhibit A in which Ms. Beter's husband is referred to as "Peter"). Therefore, we respectfully request that the Court enter an Order forbidding disclosure of the information in the email attached as Exhibit A, and prohibiting Mr. Baughman or his associates from contacting or approaching Ms. Beter or her family.

Counsel for Defendant has threatened to ask the Court to sanction me for making this request, but I have no choice given my client's legitimate fear for her safety.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Ian M. Bryson, Esquire
IAN M. BRYSON, ESQUIRE
Attorneys for Petra Christina Beter

Cc: All counsel via eCourts
Enc.